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| H.H., an individual; |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | CIVIL ACTION NO: 19-cv-755 |
| |) | |
| G6 HOSPITALITY LLC; |) | |
| |) | |
| Serve its Registered Agent: |) | Judge: |
| Corporation Service Company |) | |
| 50 West Broad Street, Suite 1330 |) | |
| Columbus, Ohio 43215 |) | |
| |) | |
| WYNDHAM HOTELS AND RESORTS, INC.; |) | JURY TRIAL DEMANDED |
| |) | |
| Serve its Registered Agent: |) | |
| Corporate Creations Network, Inc. |) | |
| 3411 Silverside Road |) | |
| Tatnall Building - Suite 104 |) | |
| Wilmington, Delaware 19810 |) | |
| |) | |
| SHAHIL, LLC; |) | |
| |) | |
| Serve its Registered Agent: |) | |
| Thomas E. Hartnett |) | |
| 200 Market Avenue North, Suite 300 |) | |
| Canton, Ohio 44702 |) | |
| |) | |
| NORTHLAND HOTEL, INC. |) | |
| |) | |
| Serve its Registered Agent: |) | |
| Joseph L. Piccin, Esq. |) | |
| 3010 Hayden Road |) | |
| Columbus, Ohio 43235 |) | |
| |) | |
| Defendants. |) | |

COMPLAINT

COMES NOW the Plaintiff H.H., by and through the undersigned counsel, and respectfully submits her complaint for damages and makes the following averments.

INTRODUCTION

1. For years, sex trafficking ventures have brazenly operated out of hotels throughout this country, and criminals, working hand-in-hand with hotels parade their misconduct openly on hotel properties across the United States while the hotels and the hospitality industry remain willfully blind to criminal misconduct, at the expense of human life, human rights, and human dignity. The human trafficking industry as it exists in the United States could not function without the complicity of the hospitality industry year after year after year.

2. Motel 6 and Super 8 brand hotel properties know and have known for more than a decade that criminal sex trafficking of adults and children repeatedly occurs on their properties throughout this country. Rather than take timely and effective measures to prevent human trafficking, Motel 6 and Super 8 brand hotels, and their respective parent companies, have instead failed to address the open and obvious presence of human trafficking on hotel properties and continued to profit from traffickers renting rooms for the explicit and readily apparent purpose of human trafficking.

3. The Plaintiff, identified by her initials H.H., is a survivor of sex trafficking. Beginning in March 2015, a sex trafficker advertised H.H. on www.backpage.com and trafficked her for sex at hotels in Columbus, Ohio including numerous times at Motel 6 and Super 8 brand hotel properties in the Columbus area.

4. As a direct and proximate result of Motel 6 and Super 8 brand hotels' consistent refusals to prevent human trafficking on their hotel properties, H.H. was sex trafficked, sexually exploited, and victimized repeatedly at Motel 6 and Super 8 brand hotels.

5. The Plaintiff brings this action against the Defendants who enabled, harbored, held, facilitated, or otherwise financially benefited, or any combination of the foregoing, from a sex trafficking venture in which H.H. was trafficked for sex, sexually exploited, and victimized in violation of the Trafficking Victims Protection Reauthorization Act of 2008, 18 U.S.C. § 1595.

JURISDICTION AND VENUE

6. This Honorable Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331 because this action arises under the Constitution, laws, or treaties of the United States.

7. Venue is proper in this district pursuant to 28 U.S.C. § 1391 because a substantial part of the events or omissions giving rise to the claims asserted in this action occurred in the judicial district where this action is brought.

PARTIES

8. Plaintiff H.H. is an individual over the age of nineteen (19) years old and resides in Ohio. The Plaintiff is a "victim" of sex trafficking as protected under applicable provisions of the TVPRA.

9. Defendant G6 Hospitality LLC ("G6") owns, manages, or operates more than 1,400 economy or budget motels under the Motel 6 brand. G6 is a Delaware limited liability company with its headquarters in Carrollton, Texas. G6 Hospitality, LLC may be served with service of process by serving its registered agent Corporation Service Company, 50 West Broad Street, Suite 1330, Columbus, Ohio 43215.

a. The Motel 6 brand operates in forty-nine (49) states. The brand's assets are strategically located throughout the United States — close to airports, freeways and other thoroughfares. In 2015, G6 was rated among the top ten (10) hospitality companies.

b. G6 represents that it has more than fifty-five (55) years of experience in managing successful brands. In managing all its Motel 6 brand properties, G6 receives an application fee, a lump sum payment, royalties, and other ongoing financial benefits from its Motel 6 branded properties.

c. As a hotel operator, G6 controls the training and policies for its branded properties including the Motel 6 Columbus. Through its relationship with the staff at the Motel 6 Columbus and the individual who trafficked H.H. at the Motel 6 Columbus while registered as a guest there, Defendant G6 knowingly benefited or received something of value from its facilitation of or participation in a venture which it knew or should have known had engaged in sex trafficking.

d. G6 receives a percentage of the gross room revenue from the money generated by the operations of the Motel 6 Columbus including a percentage of the revenue generated for the rate charged on the hotel guest rooms in which the Plaintiff was sex trafficked in 2015.

10. Defendant Shahil, LLC ("Motel 6 Columbus") is an Ohio limited liability company and is one of Defendant G6's Motel 6 branded properties. Motel 6 Columbus was involved in the staffing and operation of the Motel 6 #4442 located at 7474 North High Street in Columbus, Ohio where the Plaintiff was trafficked for sex in 2015. Through its relationship with Defendant G6 and the individual who trafficked H.H. at the Motel 6 Columbus, Defendant Motel 6 Columbus knowingly benefited or received something of value from its facilitation of or

participation in a venture which it knew or should have known had engaged in sex trafficking. Motel 6 Columbus may be served with service of process by serving its registered agent Thomas E. Hartnett, 200 Market Avenue North, Suite 300, Canton, Ohio 44702.

11. Defendant Wyndham Hotels and Resorts, Inc. (“Wyndham”) is one of the largest hotel brands in the world with nearly 9,000 branded properties in more than eighty (80) countries. It is a Delaware corporation and can be served by its registered agent Corporate Creations Network, Inc., 3411 Silverside Road, Tatnall Building Suite 104, Wilmington, Delaware 19810.

a. Defendant Wyndham Hotels and Resorts, Inc. is the successor entity to Wyndham Worldwide Corporation. Defendant Wyndham Hotels and Resorts, Inc., retains successor liability for wrongful acts of its predecessor Wyndham Worldwide Corporation. Wyndham Super 8 (“Super 8 Motel”) is a Wyndham Hotels and Resorts, Inc. brand property.

b. As a hotel operator, Defendant Wyndham controls the training and policies for its branded properties including Super 8 Columbus. Defendant Wyndham maintains that it considers guest safety and security to be of the utmost importance and requires every hotel in its portfolio to comply with Wyndham brand standards and all local, state, and federal laws.

c. Through its relationship with the staff at the Super 8 Columbus and the individual who trafficked H.H. at the Super 8 Columbus while registered as a guest there, Defendant Wyndham knowingly benefited or received something of value from its facilitation of or participation in a venture which it knew or should have known had engaged in sex trafficking.

d. Wyndham receives a percentage of the gross room revenue from the

money generated by the operations of the Super 8 Columbus including a percentage of the revenue generated for the rate charged on the hotel guest rooms in which the Plaintiff was sex trafficked in 2015.

12. Defendant Northland Hotel, Inc. (“Super 8 Columbus”) is an Ohio corporation that at all times material maintained a business in Columbus, Ohio located at 1078 East Dublin Granville Road, Columbus, Ohio 43229 by owning, managing, operating, or staffing, or any combination of the foregoing, the Super 8 Columbus where the Plaintiff was trafficked for sex in 2015. Through its relationship with the staff at the Super 8 Columbus, other Defendants, and the individual who trafficked H.H. at the Super 8 Columbus, Defendant Super 8 knowingly benefited or received something of value from its facilitation of or participation in a venture which it knew or should have known had engaged in sex trafficking. Super 8 Columbus may be served with service of process by serving its registered agent Joseph L. Piccin, Esq., 3010 Hayden Road, Columbus, Ohio 43235.

ALLEGATIONS

I. THE HOSPITALITY INDUSTRY’S PARTICIPATION IN THE NATIONAL SEX TRAFFICKING EPIDEMIC

13. At least since the beginning of this century, the pervasiveness of human trafficking, the means to prevent its scourge, and the need to punish its perpetrators have been widely known.

14. For example, at the General Assembly of the United Nations (“UN”) convened in New York, New York in November 2000, the Palermo Protocol to prevent, suppress, and punish trafficking in persons was adopted.¹

¹ Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, *adopted* Nov. 15, 2000, 2237 U.N.T.S. 319.

15. Similarly, the role of the hospitality industry in either facilitating or preventing human trafficking has been widely established and known for years.

16. In this regard, End Child Prostitution and Trafficking (ECPAT-USA) launched the Tourism Child-Protection Code of Conduct (the “Code”) in the United States in 2004.²

17. The Code identifies the following six (6) steps companies can take to prevent child sex trafficking: (1) establish corporate policy and procedures against sexual exploitation of children; (2) train employees in children’s rights, the prevention of sexual exploitation and how to report suspected cases; (3) include a clause in further partner contracts stating a common repudiation and zero tolerance policy of sexual exploitation of children; (4) provide information to travelers on children’s rights, the prevention of sexual exploitation of children and how to report suspected cases; (5) support, collaborate and engage stakeholders in the prevention of sexual exploitation of children; and (6) report annually on the company’s implementation of Code-related activities.

18. During a speech in New York City in September 2012, President Obama stated that human trafficking “ought to concern every person, because it is a debasement of our common humanity. It ought to concern every community, because it tears at our social fabric. It ought to concern every business, because it distorts markets. It ought to concern every nation, because it endangers public health and fuels violence and organized crime.”³

19. Despite these efforts by the UN, the White House, and non-governmental organizations to promote policies and procedures to prevent human trafficking, a 2012 report nevertheless revealed that sixty-three percent (63%) of human trafficking incidents occur in

² ECPAT-USA, *No Vacancy For Child Sex Traffickers Impact Report* (2017), available at: https://static1.squarespace.com/static/594970e91b631b3571be12e2/t/59c9b6bfb07869cc5d792b8c/1506391761747/NoVacany_Report.pdf.

³ President Barack Obama, Remarks to the Clinton Global Initiative (Sept. 25, 2012), available at <https://obamawhitehouse.archives.gov/the-press-office/2012/09/25/remarks-president-clinton-global-initiative>.

hotels.⁴ At the time the referenced report issued, the hospitality industry had been on notice of the prevalence of human trafficking for the entirety of the twenty-first century, but had done little to nothing to prevent the ongoing occurrences of human trafficking in hotels in the preceding twelve (12) years.

20. In 2014, ninety-two percent (92%) of the calls the National Human Trafficking Hotline received from hotels reported sex trafficking and two percent (2%) of the calls it received reported some combination of sex trafficking and labor trafficking.⁵

21. Statistics released in 2014 by the International Labor Organization (“ILO”) showed that approximately 4.5 million people were victims of forced sexual exploitation globally and that the violation of their human rights yielded an estimated annual profit of \$99 billion dollars for sex traffickers worldwide.⁶ Put another way, the numbers showed that a sex trafficker’s annual profit per victim was approximately \$22,000.00.⁷

22. A scholarly article published in 2015, estimated that pimps could earn \$25,000.00 to \$33,000.00 per week selling sex in the Atlanta, Georgia area.⁸ This volume of and profit from sex trafficking also aligned with internet advertising for the sex trafficking industry occurring in roughly the same time period. For example, in 2015, one advertisement in the Atlanta section of the www.backpage.com website triggered 181 clicks, and calls or texts from twenty-seven (27) men expressing interest - in a span of just ninety (90) minutes.⁹

⁴ Sarkisian, M., *Adopting The Code: Human Trafficking And The Hospitality Industry*, 15 CHR 15 (2015), at 3, available at <https://scholarship.sha.cornell.edu/cgi/viewcontent.cgi?article=1222&context=chrpubs>.

⁵ *Id.*

⁶ International Labour Office, *Profits and Poverty: The Economics of Forced Labour* (2014), at 13, available at https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_243391.pdf.

⁷ *Id.* at 15.

⁸ Sarkisian, *supra* n.4, at 4.

⁹ *Id.* at 5.

23. In December 2015, President Obama appointed eleven (11) survivors of human trafficking to the inaugural United States Advisory Council on Human Trafficking to advise and make recommendations on federal anti-trafficking policies to the President's Interagency Task Force to Monitor and Combat Trafficking in Persons.¹⁰

24. The United States Department of Justice ("DOJ") brought 248 sex trafficking prosecutions in Fiscal Year 2015 and secured convictions against 291 sex traffickers.¹¹ In the previous year, DOJ convicted a total of 184 human traffickers (inclusive of labor trafficking) and in the subsequent year, DOJ convicted a total 439 human traffickers (inclusive of labor trafficking).¹²

25. Despite these efforts of governmental and non-governmental organizations to combat human trafficking, the hospitality industry as a whole, continued to lag behind in its efforts to prevent human trafficking. A 2015 study showed that forty-five percent (45%) of children who suffered sexual exploitation report that the sexual exploitation took place in a hotel.¹³

26. Even estimates by attorneys *for* the hospitality industry indicate that eight (8) out of ten (10) arrests for human trafficking occur in or around hotels.¹⁴ The 2016 Trafficking in Persons Report issued by the United States Department of State also confirmed that human trafficking occurs in the hospitality industry in the United States.¹⁵

¹⁰ U.S. Dep't of State, *2016 Trafficking in Persons Report* (2016), at 41, available at <https://www.state.gov/documents/organization/258876.pdf>.

¹¹ *Id.* at 389.

¹² Human Rights First, *Fact Sheet 2017* (2017), available at <http://www.humanrightsfirst.org/sites/default/files/TraffickingbytheNumbers.pdf>.

¹³ Sarkisian, *supra* n.4.

¹⁴ Rich Keating, *Human Trafficking: What It Is And How It Impacts The Hospitality Industry*, Presentation Delivered At AHIA Sprint Conference 2013, Washington, D.C., available at http://www.ahiatlaw.org/ahia/asset_manager/get_file/92983 (last visited Mar. 1, 2019).

¹⁵ U.S. Dep't of State, *supra* n.10, at 387.

27. Between 2007 and March 2015, more than 1,400 human trafficking cases have been reported to the National Human Trafficking Resource Center.¹⁶

28. The complicity of the hospitality industry is essential to the perpetuation of human trafficking, allowing traffickers to remain transient, collect profits, and evade detection. Sex trafficking ventures move from place to place so that they are less visible to law enforcement. Similarly, sex traffickers also want to keep their victims moving from place to place to isolate them from any possible means of escape or rescue. Traffickers are well aware of the seclusion and anonymity attendant with booking rooms with hotel chains - they know it is unlikely that they will be disturbed.

29. Due to the hospitality industries failure to embrace anti-trafficking policies and practices, children and other vulnerable persons are trafficked for sex in hotels throughout the United States.

30. Hotel employees are uniquely situated to identify and report suspicious activity on hotel property. From check-in to check-out there are numerous indicators that traffickers and the adults and children who are victimized by sex trafficking exhibit during their stay at a hotel property. With proper training and other reasonable security measures, hotel owners and operators could prevent the trafficking of persons on their properties.

31. A successful trafficking protocol should start with a hotel's front desk staff. A hotel's front desk is first in line to spot warning signs of human trafficking. A successful trafficking protocol also requires hotels make available throughout the facility, information for victims of human trafficking on how to seek help.

¹⁶ Polaris, *Human Trafficking and the Hotel Industry* (2015), available at <https://polarisproject.org/resources/human-trafficking-and-hotel-industry>.

32. Signs of sex trafficking at a hotel include, but are not limited to, the following: an excess of condoms in rooms, individuals carrying or flashing large amounts of cash, renting two (2) rooms next door to each other, declining room service for several consecutive days, significant foot traffic in and out of rooms, men traveling with multiple unrelated women, guests checking in with little or no luggage, hotel guests who prevent another individual from speaking for themselves, or a guest controlling another's identification documents.

33. The Department of Homeland Security ("DHS") identifies a number of warning signs that indicate the presence of human trafficking at hotels. According to DHS, housekeeping, room service, maintenance, concierge, bellman, front desk, food and beverage, security, and valet staff at hotels all can and should be vigilant in observing indicia of human trafficking on the hotel premises such as:

- (a) persons who show signs of malnourishment, poor hygiene, fatigue, sleep deprivation, untreated illness, injuries, and/or unusual behavior;
- (b) persons who lack freedom of movement or are constantly monitored;
- (c) persons who have no control over or possession of money or ID;
- (d) persons who dress inappropriately for their age or have lower quality clothing compared to others in their party;
- (e) requests for room or housekeeping services (additional towels, new linens, etc.), but denial of hotel staff entry into the room;
- (f) the presence of multiple computers, cell phones, pagers, credit card swipers, or other technology in the room;
- (g) extended stay with few or no personal possessions in the room;
- (h) excessive amounts of sex paraphernalia in rooms (condoms, lubricant, lotion);

- (i) the same person reserves multiple rooms;
- (j) a room is rented hourly, less than a day, or for an atypical extended stay;
- (k) attempts to sell items to or beg from patrons or staff;
- (l) cars in the parking lot regularly parked backward, so the license plates are not visible;
- (m) loitering and solicitation of male patrons;
- (n) waiting at a table or bar and picked up by a male (trafficker or customer);
- (o) persons asking staff or patrons for food or money; and
- (p) persons taking cash or receipts left on tables.¹⁷

34. Hotel staff who have undergone training are more aware of human trafficking and can at best prevent it from happening or at worst, are more willing to report it when it happens, than hotel staff who have not been trained.

35. Hotels and hotel brands can and should adopt policies and procedures related to human trafficking and make anti human trafficking resources readily available to employees.

36. Hotels and hotel brands can and should mandate that all staff working at all hotel properties complete anti human trafficking training.

37. Hotels and hotel brands can and should encourage staff to report suspected incidents of human trafficking when observed on hotel properties.

38. Hotels and hotel brands can and should develop and maintain relationships with law enforcement regarding appropriate and timely responses to suspected incidents of human trafficking on hotel properties.

¹⁷ U.S. Dep't of Homeland Security, *Human Trafficking and the Hotel Industry*, <https://www.dhs.gov/blue-campaign/hospitalityindustry> (last visited Feb. 25, 2019).

39. Hotels and hotel brands can and should post anti human trafficking awareness and informational materials in common areas and guest rooms to help eliminate human trafficking.

40. Similarly, hotels and hotel brands can and should develop and maintain relationships with non-profit service providers in the field regarding appropriate human trafficking prevention training for hotel staff.

41. The indicia of human trafficking and effective preventative measures are widely known and available to the hospitality industry and hotels and hotel brands that do not identify and report evidence of human trafficking on hotel properties do so in spite of the knowledge of that preventative training and resources are available, but they simply elect not to engage in preventative policies and practices.

42. The motivation for this ongoing willful blindness and ongoing failure to act within the hospitality industry is plain and simple—limitless corporate greed. Hotels and hotel brands, knowing both the obvious dangers and the remedial safety precautions associated with human trafficking, nevertheless ignored both the signs of and solutions to human trafficking out of an unfettered fealty to their profit margins and a corresponding complete disregard for the value of human life.

II. THE SEX TRAFFICKING OF H.H.

43. One of the lives devalued and otherwise adversely affected by the hospitality industry's inattention to the prevention and eradication of sex trafficking was that of H.H. By March 2015, the Plaintiff had lost her job, her home, and her children. She was staying in a domestic violence shelter and was especially vulnerable and desperate both emotionally and financially. The Plaintiff met a man online that she thought was interested in dating her. Unfortunately, his plan was to traffick her in hotels throughout the Columbus, Ohio region.

44. After posting, without permission, graphic photographs of the Plaintiff online at www.backpage.com, her trafficker coerced and otherwise forced her into sex trafficking by using violence, threats of violence, and drugs.

45. From approximately March 2015 until October 2015, the Plaintiff was repeatedly trafficked for sex at both the Motel 6 #4442 located at 7474 N. High Street in Columbus, Ohio and the Super 8 Motel located at 1078 E. Dublin-Granville Road, in Columbus, Ohio.

46. Despite obvious signs of human trafficking (branding, restraints, bruises, physical deterioration) and indicators of commercial sex activity (bottles of lubricants, boxes of condoms, excessive requests for towels and linens, cash payments) the Defendants failed to protect the Plaintiff from foreseeable harms and failed to prevent her continued victimization. Rather than prevent human trafficking, the Defendants knowingly continued to profit from the sex trafficking of the Plaintiff by harboring or otherwise facilitating the sex trafficking venture operating out of their hotels. At each of the Defendant hotels, the Plaintiff was routinely escorted by her trafficker to the front desk to hand deliver cash payments for the reserved room out of which the sex trafficking venture operated. The indicia of human trafficking were open and obvious at the Defendant hotels and the Defendant hotels were willfully blind to the indicia of human trafficking to the great detriment and injury to the Plaintiff.

47. During the time period in which the Plaintiff was sex trafficked in Columbus, Ohio, she was discovered by the hotel cleaning staff at the Defendant Motel 6 Columbus tied to the guest room bed and despite her desperate pleas for help, the staff ignored her and did nothing to rescue or otherwise protect the Plaintiff from the ongoing and obvious torture she was enduring while being trafficked for sex at the Defendant Motel 6 Columbus.

48. Similarly, at the Defendant Super 8 Columbus, a female member of the hotel housekeeping staff with long, dark hair discovered the Plaintiff chained up in the bathroom of the hotel room out of which she was being trafficked. Again, despite the Plaintiff's desperate pleas for help, the staff person ignored her and did nothing to rescue or otherwise protect her from the ongoing and obvious torture she was enduring while being trafficked for sex at the Defendant Super 8 Columbus.

49. The Plaintiff's trafficker transported her to and from the Defendant hotels after stays lasting approximately two (2) to three (3) weeks at each. On average, ten (10) to fifteen (15) "johns" would enter and leave the hotel room where the Plaintiff was trafficked on a daily basis. During the period of her sexual exploitation at the Defendant hotels in Columbus, Ohio, the Plaintiff was forced to have sex with over a thousand (1,000) johns at the Defendant hotels.

50. In October 2015, the Plaintiff courageously escaped her trafficker while at the Defendant Super 8 Columbus by waiting for an opportunity to flee. The impact of being starved, branded, beaten, physically restrained, emotionally abused, and sex trafficked in the Defendant hotels has forever emotionally and physically injured the Plaintiff who despite many years since her escape suffers immensely as a result of the horrors inflicted upon her at the Defendant hotels.

III. DEFENDANT G6'S WILLFUL BLINDNESS TO HUMAN TRAFFICKING AT ITS HOTELS AND PROPERTIES

51. For years Defendant G6 has been on notice of repeated incidences of sex trafficking occurring on its Motel 6 branded properties, yet Defendant G6 has failed to take action to prevent sex trafficking at Motel 6 brand properties and still persists in failing to take necessary action to prevent sex trafficking on its properties. Defendant G6's inattention in this regard enabled and contributed to the sex trafficking the Plaintiff suffered at the Motel 6 Columbus.

52. More than half the bookings at Motel 6 properties occur on the same day as arrival. Accordingly, Motel 6 brand executives have worked to make booking hotel rooms at their properties even easier. As one executive of the Motel 6 brand has stated: “Analytics is our North Star. It’s how we make decisions, it’s how we drive our strategy and it’s how we dictate performance.” As alleged herein, the Motel 6 brand has been more than willing to use data analytics to increase its profits, but historically has refused to use data analytics, or take any reasonable measures, to prevent human trafficking on Motel 6 properties.¹⁸

53. The Motel 6 brand advertises that customers ‘Save more for what you travel for®’ and for its customers traveling for the purpose of sex trafficking adults and children, these customers are able to save more and thus profit more for what they are traveling for - selling human beings for sex.

54. Knowing these risks associated with its policies and practices and its marketing strategies in relation to the Motel 6 brand, Defendant G6 nevertheless maintains a “consistent, unwavering commitment to this brand positioning[.]”¹⁹

55. There are countless examples across place and time of Defendant G6’s knowledge of sex trafficking on its Motel 6 branded properties and its continued, total inattention to preventing and remedying the blight of human trafficking on the lives and liberties of its victims. The illicit, criminal misconduct is so rampant on Motel 6 branded properties that one online reviewer suggested on a travel website that Motel 6 “Should Be Called Motel Sex.”²⁰

¹⁸ Allison Schiff, *Motel 6: ‘Analytics Is Our North Star’*, AdExchanger (Sept. 7, 2017), <https://adexchanger.com/analytics/motel-6-analytics-north-star/amp/>.

¹⁹ G6 Hospitality LLC, *Motel 6 - An Iconic American Brand*, <http://www.g6hospitality.com/about/brands> (last visited Mar. 1, 2019).

²⁰ Review Of Motel 6 Rochester (Aug. 1, 2018), *available at* https://www.tripadvisor.com/ShowUserReviews-g43466-d242739-r601808847-Motel_6_Rochester-Rochester_Minnesota.html (last visited Feb. 28, 2019) (the reviewer was commenting in August 2018, on a Motel 6 located at 2107 West Frontage Road, Rochester, Minnesota 55901 and added, “Prostitutes, drug dealers, and loud partiers are your neighbors including possibly one or two staff

56. In late 2003, a trafficker set up a sex trafficking venture at a Motel 6 in Connecticut in which two (2) young women were sold for sex eight (8) to ten (10) times per day.²¹

57. In April 2009, a sex trafficking venture operated out of a Motel 6 in Toledo, Ohio.²²

58. In approximately September 2011, sex traffickers set up an operation at a Motel 6 in Toledo, Ohio to sell fifteen (15) and sixteen (16) year old girls for sex.²³

59. From approximately 2012 through October 2014, two (2) men engaged in a criminal sex trafficking venture of children which operated in part out of a Motel 6 in Harvey, Illinois.²⁴

60. Police rescued an eighteen (18) year old girl from a sex trafficker in February 2012, at a Motel 6 in Portland, Oregon.²⁵

61. The FBI investigated and arrested several individuals in December 2012, for the victimization and human trafficking of several young women and a juvenile at a Motel 6 in Madison, Alabama.²⁶

members. Complaints to the clerk do no good. The night clerk does not write it down and the day clerks accuse you of lying although I made it clear that I did not want anything in return for my complaints.”).

²¹ Amy Fine Collins, *Sex Trafficking Of Americans: The Girls Next Door*, Vanity Fair (May 2011), <https://www.vanityfair.com/news/2011/05/human-trafficking-201105>.

²² *Five Toledoans Indicted On Sex Trafficking Charges*, ABC7Chicago.com (Nov. 7, 2010), <https://abc7chicago.com/archive/7771888/>.

²³ Mark Reiter, *Two Toledoans Accused Of Juvenile Sex Trafficking*, The Blade (Jun. 1, 2010), <https://www.toledoblade.com/Courts/2012/06/02/2-Toledoans-accused-of-juvenile-sex-trafficking-1.html>.

²⁴ Complaint, *United States of America v. Samuel Nichols, et al.*, No. 1:15-cr-00756 (N.D. Ill. Dec. 29, 2015); *see also* Press Release, U.S. Dep’t of Justice, *Two Aspiring Rappers Charged With Operating Sex-Trafficking Ring In Chicago And Suburbs* (Jan. 15, 2016), <https://www.justice.gov/usao-ndil/file/813771/download>.

²⁵ Press Release, U.S. Dep’t of Justice, *Tacoma Pimp Sentenced To 25 Years For Sex-Trafficking Two Victims* (Nov. 20, 2013), <https://www.justice.gov/usao-or/pr/tacoma-pimp-sentenced-25-years-sex-trafficking-two-victims>.

²⁶ *FBI Investigates Human Trafficking At Madison Hotel*, WHNT News 19 (Dec. 7, 2012), <https://whnt.com/2012/12/07/fbi-investigates-human-trafficking-at-madison-motel/>.

62. The Orange County Human Trafficking Task Force busted a criminal enterprise in December 2012, that was selling women for sex out of a Motel 6 in Anaheim, California.²⁷

63. In approximately March 2013, sex traffickers began operating a sex trafficking venture out of Motel 6 locations in Bangor and Portland, Maine.²⁸

64. Beginning in approximately May 2013, a fifteen (15) year old runaway was trafficked for sex out of the Motel 6 on Caton Avenue in Baltimore, Maryland.²⁹

65. The FBI busted a sex trafficking ring operating out of a Motel 6 in San Antonio, Texas in September 2013.³⁰

66. In Richmond County, Georgia a man was arrested at a local Motel 6 in October 2013, and charged with sex trafficking of two young women.³¹

67. Police investigated a sex trafficker in March 2014 and ultimately charged him for his crimes including, but not limited to, selling a seventeen (17) year old girl for sex out of a Motel 6 in Roseville, Minnesota.³²

68. In May 2014, two (2) traffickers were arrested at a Motel 6 in Monterey, California after a twenty-one (21) year old woman escaped from their captivity.³³

²⁷ *Suspects Busted In Anaheim Sex Ring*, ABC13 Eyewitness News (Dec. 5, 2012), <https://abc13.com/archive/8909784/>.

²⁸ Danielle McLean, *What Drives Maine Sex Traffickers' Inhumanity*, Bangor Daily News Maine Focus (Sept. 12, 2016), <https://bangordailynews.com/2016/09/12/mainefocus/what-drives-maine-sex-traffickers-inhumanity/>.

²⁹ Anne Kramer, *Man Faces Prison Time For Sex Trafficking Baltimore Teen*, WBAL News Radio (Apr. 10, 2014), <https://www.wbal.com/article/106578/2/man-faces-prison-time-for-sex-trafficking-baltimore-teen>.

³⁰ Stephanie Serna, *Sex Trafficking Ring Busted At Motel 6* (Sept. 17, 2013), <https://www.ksat.com/news/sex-trafficking-ring-busted-at-motel-6>.

³¹ *UPDATE: Man Arrested For Sex Trafficking*, WRDW.com On Your Side, (Oct. 3, 2013), <https://www.wrdw.com/home/headlines/Man-arrested-for-sex-trafficking-226301261.html>.

³² *Man, 25, Is Accused Of Trafficking Teens*, Twin Cities Pioneer Press (Jun. 5, 2014), <https://www.twincities.com/2014/06/05/man-25-is-accused-of-trafficking-teens-2/>.

³³ Felix Cortez and Amy Larson, *Monterey Police: 2 Human Sex Traffickers Arrested After Victim Escapes Motel*, KSBW8 (May 9, 2014), <https://www.ksbw.com/article/monterey-police-2-human-sex-traffickers-arrested-after-victim-escapes-motel/1054172>.

69. In the summer of 2014, two (2) girls ages fifteen (15) and sixteen (16) were taken from a children's shelter by a sex trafficker and trafficked out of a Motel 6 in Cutler Bay, Florida.³⁴

70. A Las Vegas man was charged with sex trafficking two (2) victims, including a seventeen (17) year old girl, in January 2015, out of a Motel 6 in Rapid City, Nevada.³⁵

71. In February 2015, two (2) men were arrested for sex trafficking a fourteen (14) year old girl at a Motel 6 in Seekonk, Rhode Island.³⁶

72. A local law enforcement investigation resulted in the rescue of a fifteen (15) year old runaway in February 2015, from a Motel 6 near the Oakland, California airport where she was being sex trafficked.³⁷

73. In North Charleston, South Carolina, a seventeen (17) year old girl was rescued in March 2015 from a Motel 6 by special agents from the United States Department of Homeland Security. The girl was sold for sex, beaten, and starved by a sex trafficker.³⁸

74. Two men were arrested in March 2015 for sex trafficking a fifteen (15) year old girl at Motel 6 in Austin, Texas.³⁹

³⁴ David Goodhue, *Next Stop For Man Accused Of Sex Trafficking 2 Teens: Federal Court*, Miami Herald (Sept. 2, 2015), <https://www.miamiherald.com/news/local/news-columns-blogs/deadline-miami/article33360843.html>.

³⁵ *Las Vegas Man Charged With Human Trafficking In Rapid City*, Argus Leader (Jan. 17, 2015), <https://www.argusleader.com/story/news/crime/2015/01/17/las-vegas-man-charged-human-trafficking-rapid-city/21922915/>.

³⁶ Stephen Peterson, *RI Man Gets Jail In Sex-Trafficking Case Involving Seekonk Motel* (Oct. 28, 2016), http://www.thesunchronicle.com/news/local_news/ri-man-gets-jail-in-sex-trafficking-case-involving-seekonk/article_d7a25494-9d21-11e6-8f94-63e5c74facb3.html.

³⁷ Emilie Raguso, *Woman Charged In Berkeley Teen Sex Trafficking Case* (Dec. 8, 2015), <https://www.berkeleyside.com/2015/12/08/woman-charged-in-berkeley-teen-sex-trafficking-case>.

³⁸ Melissa Boughton, *Police Say Teen Starved, Beaten At North Charleston Hotel; Man Arrested In Sex-Trafficking Case* (Mar. 2, 2015), https://www.postandcourier.com/archives/police-say-teen-starved-beaten-at-north-charleston-motel-man/article_032153ee-fcb6-5333-9182-926a7f43dfbf.html.

³⁹ Lindsay Bramson, *Local Teen Saved From Sex Slavery; Two Charged*, KXAN Austin (Mar. 6, 2015), <https://www.kxan.com/news/local/austin/local-teen-freed-from-sex-slavery-two-charged/1049580764>.

75. In March 2015, police arrested a man for sex trafficking a runaway seventeen (17) year old at a Motel 6 in Warwick, Rhode Island.⁴⁰ Over a fourteen (14) month period ending in approximately April 2015, a the same Motel 6 in Warwick, Rhode Island had seventy-five (75) arrests on its property for crimes including sex-trafficking.⁴¹

76. Seven (7) people were indicted in January 2016, by a Colorado grand jury for sex trafficking children from 2014 through the summer of 2015, out of hotels in Denver, Colorado, including a Denver area Motel 6.⁴²

77. In the summer of 2015, a woman was arrested at a Motel 6 in Great Falls, Montana where she was involved in sex trafficking a seventeen (17) year old girl.⁴³

78. A married couple was indicted in June 2015, for their roles in sex trafficking minor children ages seventeen (17), sixteen (16), and fifteen (15) years old out of a Motel 6 in Everett, Washington.⁴⁴

79. In Tuscaloosa, Alabama police rescued a fourteen (14) year old girl from a Motel 6 in June 2015, and a grand jury subsequently charged her assailant with human trafficking and rape.⁴⁵

80. In approximately July 2015, sex traffickers sold a fifteen (15) year old girl for sex at a Motel 6 in Pismo Beach, California.⁴⁶

⁴⁰ Amanda Milkovits, *Massachusetts Man Accused Of Trafficking Teen In Warwick Motel*, NewportRI.com (Mar. 24, 2015), <https://www.newportri.com/article/20150324/NEWS/150329666>.

⁴¹ Sarah Kaplan, *Crime-Ridden Motel 6 In R.I. Will Hand Over Guest List To Police*, The Washington Post (Apr. 28, 2015), https://www.washingtonpost.com/news/morning-mix/wp/2015/04/28/crime-ridden-motel-6-in-r-i-will-hand-over-guest-list-to-police/?utm_term=.a804ce3f32a8.

⁴² Hsing Tseng, *Seven Indicted By Colorado Grand Jury In Child Sex Trafficking Ring Bust*, Fox 31 Denver (Jan. 6, 2016), <https://kdvr.com/2016/01/06/7-indicted-by-colorado-grand-jury-in-child-sex-trafficking-ring-bust/>.

⁴³ Andrea Fisher, *Woman Caught Up In Human Trafficking Ring Pleads Guilty* (Aug. 29, 2016), <https://www.greatfallsbtribune.com/story/news/local/2016/08/29/woman-caught-human-trafficking-ring-pleads-guilty/89566374/>.

⁴⁴ Diana Hefley, *County Investigating 45 Ongoing Human Sex Trafficking Cases*, HeraldNet (Jun. 26, 2015), <https://www.heraldnet.com/news/county-investigating-45-ongoing-human-sex-trafficking-cases/>.

⁴⁵ *Tuscaloosa Man Charged With Rape And Trafficking Mississippi Teen*, NewsMississippi (Nov. 7, 2014), <https://newsms.fm/tuscaloosa-man-charged-human-trafficking-mississippi-teen/>.

81. In November 2015 a man was arrested at a Motel 6 in Ventura, California and was criminally charged with sex trafficking a fifteen (15) year old girl who was found with him.⁴⁷

82. In January 2016, a man who operated a criminal venture out of a Motel 6 in Frederick City, Maryland was charged with sex trafficking.⁴⁸

83. Criminal charges were brought against a man who sex trafficked a fifteen (15) year old girl out of a Motel 6 in Beaumont, Texas in March 2016.⁴⁹

84. On March 23, 2016, a victim of a sex trafficking ring died at a Motel 6 in Winchester, West Virginia.⁵⁰

85. The leader of a sophisticated and organized sex trafficking ring beat and raped one of his victims in April 2016, at a Motel 6 in Tinicum Township, Pennsylvania.⁵¹

86. A federal court sentenced a man to ten (10) years in prison in November 2016, for sex trafficking a fifteen (15) year old girl in 2014 out of a Motel 6 in Hartford County, Connecticut.⁵²

87. Local law enforcement rescued a seventeen (17) year old runaway in December 2016, who was being sex trafficked from a Motel 6 in Gibbstown, New Jersey.⁵³

⁴⁶ Matt Fountain, *Four Accused Of Pimping Out 15-Year-Old Girl In SLO Will Will Stand Trial*, SanLuisObispo.com (May 5, 2016), <https://www.sanluisobispo.com/news/local/article75832962.html>.

⁴⁷ *Fresno Man Sentenced To Prison For Pimping, Human Trafficking In Ventura County*, Ventura County Star (Apr. 26, 2016), <https://www.vcstar.com/story/news/local/communities/ventura/2016/04/26/fresno-man-sentenced-to-prison-for-pimping-human-trafficking-in-ventura-county/88714698/>.

⁴⁸ *Frederick Police Arrest Man On Human Trafficking Charges*, CBS13 Baltimore (Jan. 16, 2016), <https://baltimore.cbslocal.com/2016/01/16/frederick-police-arrest-man-on-human-trafficking-charges/>.

⁴⁹ Quentin Hope, *Women Accuse Defendant Of Sex Trafficking, Threatening To Kill Them*, KFDm.com (Sept. 11, 2018), <https://kfdm.com/news/local/women-accuse-defendant-of>.

⁵⁰ Ellie Williams, *Martinsburg Man Convicted On Sex Trafficking And Drug Charges*, LocalDVM.com (Jan. 17, 2019), <https://www.localdvm.com/news/virginia/martinsburg-man-convicted-on-sex-trafficking-drug-charges/1708490814>.

⁵¹ Justin Heinze, *Man Behind Human Trafficking Ring In Chester County Sentenced*, Patch (Sept. 26, 2017), <https://patch.com/pennsylvania/phoenixville/man-behind-human-trafficking-ring-chester-county-sentenced>.

⁵² David Owens, *Hartford Man Sentenced To Prison For Sex Trafficking Of 15-Year-Old Girl*, Hartford Courant (Nov. 14, 2016), <https://www.courant.com/news/connecticut/hc-sex-trafficking-teenager-prison-1115-20161114-story.html>.

88. In February 2017, the leader of a child sex trafficking ring in Tulsa, Oklahoma, was busted at a local Motel 6 where federal authorities rescued a sixteen (16) year old survivor of sex trafficking.

89. A forty-five (45) year old man was charged with human trafficking after picking up a teenage boy from school and taking him to a Motel 6 in Cedar Park, Texas in approximately March 2017.⁵⁴

90. At a Motel 6 in Des Moines, Iowa a man sex trafficked a minor victim in June 2017.⁵⁵

91. In approximately June 2017, a seventeen (17) year old runaway was rescued by law enforcement from a Motel 6 in Las Vegas, Nevada out of which a sex trafficker was operating.⁵⁶

92. A seventeen (17) year old girl was sold for sex by traffickers at a Motel 6 in Portland, Oregon in June 2017.⁵⁷

93. In August 2017, two (2) men operated out of a Motel 6 in Springfield, Virginia to sex traffick a sixteen (16) year old girl.⁵⁸

⁵³ Matt Gray, *Three Indicted On Charges Of Forcing Teen Into Prostitution*, NJ.com (Sept. 24, 2017), https://www.nj.com/gloucester-county/index.ssf/2017/09/post_139.html.

⁵⁴ *Little Elm Man Accused Of Trafficking Austin Teen*, KHOU11.com (Sept. 19, 2017), <https://www.khou.com/article/news/local/texas/little-elm-man-accused-of-trafficking-austin-teen/285-476893013>.

⁵⁵ Luke Nozicka, *Seven Des Moines Residents Charged With Sex Trafficking, Feds Say*, The Des Moines Register (Jun. 11, 2018), <https://www.desmoinesregister.com/story/news/crime-and-courts/2018/06/11/7-des-moines-residents-charged-sex-trafficking-feds-des-moines-sexual-prostitution-iowa-texas/692264002/>.

⁵⁶ Rachel Crosby, *Woman Accused Of Sex Trafficking Runaway On Las Vegas Strip*, Las Vegas Review-Journal (Jun. 2, 2017), <https://www.reviewjournal.com/crime/sex-crimes/woman-accused-of-sex-trafficking-runaway-on-las-vegas-strip/>.

⁵⁷ Nick Morgan, *Accused Human Traffickers Stopped In Medford*, Mail Tribune (Jul. 7, 2017), <http://mailtribune.com/news/crime-courts-emergencies/accused-human-traffickers-stopped-in-medford>.

⁵⁸ Emily Leayman, *16-Year-Old Forced To Be Prostitute At Springfield Motel: Report*, Patch (Feb. 6, 2018), <https://patch.com/virginia/burke/16-year-old-forced-be-prostitute-springfield-motel-report>.

94. The City of Los Angeles settled a nuisance suit with G6 Hospitality, which operates Motel 6 hotels, in August 2017, for \$250,000.00 in an effort to combat human trafficking at Motel 6 brand hotels.⁵⁹

95. In October 2017, the County Attorney's Office for Harris County, Texas sued a local Motel 6 after law enforcement identified the property as a criminal hotspot that had been attracting drug activity, human trafficking, and violent crime for years. The suit alleged the Motel 6 knowingly tolerated and failed to make reasonable efforts to abate the criminal activities on its property.⁶⁰

96. Two (2) men were arrested in December 2017, for sex trafficking a minor female out of a Motel 6 in Destin, Florida.

97. In February 2018, a man engaged in sex trafficking of two (2) women at a Motel 6 near New Orleans, Louisiana.⁶¹

98. The Columbus City Attorney's Office issued ultimatums in February 2018, to several area hotels to clean up or shut down, including but not limited to, the Motel 6 at 7480 North High Street which, according to police, had been the site of significant criminal activity and is nearby the Motel 6 Columbus.⁶²

99. Law enforcement responded to a 911 call from a seventeen (17) year old girl who was calling from the lobby of a Motel 6 in Claremont, California in February 2018. Upon

⁵⁹ Michael Balsamo, *Motel 6 To Pay To Settle Human Trafficking Case*, APNews.com (Aug. 31, 2017), <https://apnews.com/d13636fec55c42b88a08af18db6196fb>.

⁶⁰ Mayra Cruz, *Harris County Sues Spring Area Motel Labeled Hot Spot For Crime*, Chron.com (Oct. 20, 2017), <https://www.chron.com/neighborhood/spring/news/article/Harris-County-sues-Spring-area-motel-labeled-12293254.php>.

⁶¹ Emily Lane, *Man Accused Of Trafficking Took Females To New Orleans To 'Make Some Money For Mardi Gras'*, Nola.com (Oct. 18, 2018), <https://www.nola.com/crime/2018/10/man-accused-of-trafficking-took-females-to-new-orleans-to-make-some-money-for-mardi-gras-warrant.html>.

⁶² Maureen Kocot, *Columbus Cracks Down On Businesses With High Crime Rates*, 10 WBNS (Feb. 7, 2018), <https://www.10tv.com/article/columbus-cracks-down-businesses-high-crime-rates>.

arrival, officers discovered that the seventeen (17) year old caller and a fifteen (15) year old girl were both being sex trafficked at the hotel.⁶³

100. In March 2018, police found a ten (10) year old girl wearing a dog collar with a twenty-three (23) year old man who had raped her at a Motel 6 in Lakeland, Florida.⁶⁴

101. In Richfield, Minnesota a man was criminally charged in June 2018, for sex trafficking a fifteen (15) year old girl out of an area Motel 6.⁶⁵

102. Police busted a human trafficking operation at a Motel 6 in Ann-Arbor, Michigan in July 2018.⁶⁶

103. A Motel 6 in Braintree, Massachusetts surrendered its operating license in September 2018, after significant criminal activity, including sex trafficking, was documented occurring on its property.⁶⁷

104. Not until September 2018, did Defendant G6 announce that “the company will introduce anti-human trafficking training to corporate, field and property team members...Additionally, the company developed its own training for all property team members to understand how to effectively intervene and identify potential trafficking situations to protect each other, guests and the community.”

105. Even after this announcement, sex trafficking at Motel 6 properties continued.

⁶³ Serena Fangary, *Social Media, Sexual Assault, And Sex Trafficking*, Webb Canyon Chronicle (May 23, 2018), <https://webbcanyonchronicle.com/2953/features/social-media-sexual-assault/>.

⁶⁴ David Neal, *Florida Man, Burger King Manager Met His Online Girlfriend For A Hotel Sex Date, Cops Say. She's 10.*, Miami Herald (Mar. 29, 2018), <https://www.miamiherald.com/news/local/community/miami-dade/west-miami-dade/article207303799.html>.

⁶⁵ *Man Charged With Sex Trafficking, Prostitution Of 15-Year-Old At Richfield Motel*, 5 ABC Eyewitness News (Jun. 19, 2018), <https://kstp.com/news/man-charged-sex-trafficking-richfield-hotel/4955796/>.

⁶⁶ Darcie Moran, *Man Charged With Human Trafficking At Ann Arbor-Area Hotel*, MLive.com (Dec. 7, 2018), <https://www.mlive.com/news/ann-arbor/2018/12/man-charged-with-human-trafficking-at-ann-arbor-area-hotel.html>.

⁶⁷ Daniel Libon, *Motel 6 Ends Fight To Reopen Braintree Location*, Patch (Sept. 19, 2018), <https://patch.com/massachusetts/braintree/motel-6-ends-fight-reopen-braintree-location>.

106. In November 2018, federal authorities arrested a man for sex trafficking a woman out of a Motel 6 in San Jose, California.⁶⁸

107. In December 2018, a husband and wife were arrested for sex trafficking women who were Chinese nationals out of a Motel 6 in Portsmouth, New Hampshire from approximately 2016 through 2017.⁶⁹

108. A fourteen (14) year old girl was held against her will at a Motel 6 in Raleigh, North Carolina and sex trafficked in or around January 2019.⁷⁰

109. Additionally, Defendant G6 has been aware of sex trafficking occurring on Motel 6 brand properties through publicly available online review websites such as www.yelp.com. Online reviews show the pervasiveness of customer reported sex trafficking on Motel 6 brand properties and Defendant G6's inattentiveness, for example:

a. Regarding a November 2012, stay at a Motel 6 in Madison, Alabama a customer wrote: "[L]ocal police raided several rooms in the a.m. And arrested numerous 'guests' for what we later found out were drug, prostitution, and sex trafficking charges!! Like a movie. An extra \$20 bucks gets you a better room, healthier conditions, and no 2 am swat team visit."⁷¹

b. Another guest of the Motel 6 located at 8995 Madison Boulevard, Madison, Alabama 35758 wrote an online review in April 2015, entitled, "We'll Leave the RED-Light on for You[.]" deriding the Motel 6 brand's advertising campaign, "We'll leave the light

⁶⁸ *Alleged Pimp Arrested in San Jose for Sex-Trafficking Young Woman He Found on Instagram*, San Jose Inside (Nov. 9, 2018), <https://www.sanjoseinside.com/2018/11/09/alleged-pimp-arrested-in-san-jose-for-sex-trafficking-young-woman-he-found-on-instagram/>.

⁶⁹ Elizabeth Dinan, *Husband, Wife Charged In Sex Trafficking 'Scheme'*, Fosters.com (Dec. 14, 2018), <https://www.fosters.com/news/20181214/husband-wife-charged-in-sex-trafficking-prostitution-scheme>.

⁷⁰ Amanda Lamb, *Third Man Arrested In Raleigh Alleged Child Trafficking*, WRAL.com, <https://www.wral.com/third-man-arrested-in-raleigh-alleged-child-trafficking/18104963/> (last visited Feb. 28, 2019).

⁷¹ Review Of Motel 6 Huntsville-Madison (Dec. 26, 2012), *available at* https://www.tripadvisor.com/ShowUserReviews-g30677-d244048-r201566882-Motel_6_Huntsville_Madison-Madison_Alabama.html (last visited Feb. 28, 2019).

on for you®.”⁷² The guest went on to describe indicia of human trafficking which the security guard on site ignored and concluded: “I’ve since read other reviews that claimed prostitution, sex-trafficking, and drug use at this hotel; after my one night’s stay, I have NO reason to question these claims.”⁷³

c. In September 2015, a guest of the Motel 6 located at 31 North Green Bay Road, Waukegan, Illinois 60085 wrote: “HORRIBLE HOTEL!!!...Prostitutes all over, drug dealers thru [sic] the hallway and parking lot[.]”⁷⁴

d. A guest of the Motel 6 located at 2727 White Lane, Bakersfield, California 93304 wrote in October 2015: “Prostitutes and drug dealers hung around outside for hours.”⁷⁵

e. The Motel 6 located at 20 Jefferson Boulevard, Warwick, Rhode Island 02888 received this review in April 2016: “This motel has been in the news for domestic disputes, police standoffs, illegal meth labs, robberies, beatings, prostitution, and human trafficking. I am SHOCKED they are still in business. ...[T]he motel looks post apocalyptic. Stay here for Halloween if you really want the scare of your life.”⁷⁶

f. In September 2016, a reviewer described a Motel 6 in Austin, Texas as follows: “we witnessed shady, sketchy activities of all sorts going on in the parking lot as well as at the businesses surrounding the motel which included: drug activity and use...shady characters

⁷² Review Of Motel 6 Huntsville-Madison (Apr. 29, 2015) https://www.tripadvisor.com/ShowUserReviews-g30677-d244048-r266732408-Motel_6_Huntsville_Madison-Madison_Alabama.html (last visited Mar. 1, 2019).

⁷³ *Id.*

⁷⁴ Review Of Motel 6 Waukegan (Sept. 14, 2015), *available at* <https://www.yelp.com/biz/motel-6-waukegan> (last visited Feb. 28, 2019).

⁷⁵ Review Of Motel 6 Bakersfield (Oct. 22, 2015), *available at* <https://www.yelp.com/biz/motel-6-bakersfield> (last visited Feb. 28, 2019).

⁷⁶ Review Of Motel 6 Warwick (Apr. 10, 2016), *available at* <https://www.yelp.com/biz/motel-6-warwick> (last visited Feb. 28, 2019).

circling the buildings multiple times, sex worker transactions, an actual fight, and possible human trafficking activity.”⁷⁷

g. A review of the Motel 6 located at 34047 Fremont Boulevard, Fremont, California 94555 posted in February 2017 stated: “Guys might be sex trafficking at this Motel 6. I saw young girls and older men often.”⁷⁸

h. A guest of the Motel 6 located at 497 Quince Orchard Road, Gaithersburg, Maryland 20878 bemoaned in May 2017: “At one point the fighting between the prostitutes and pimp was so loud that the police were called.”⁷⁹

i. The Motel 6 located at 1015 South Washburn Street, Osh Kosh, Wisconsin received the following review in May 2018: “It was in a very dangerous area and the first night I was there and returned from an outing... there were 8 police men busting some human trafficking people!! This is common there I found out.”⁸⁰

j. A guest of a Motel 6 in Lawrenceville, New Jersey reported in July 2018: “[A] woman walked...in, barely able to hold herself up and clearly drugged out of her mind[.] She told [the clerk] she had ‘an appointment’ in room 2-whatever, he handed her a keycard, and she...flagged down a car that was pulled off near the entrance, and walked towards the rooms at the back of the building as the car followed her. To me, that screamed human trafficking/prostitution.”⁸¹

⁷⁷ Review Of Motel 6 Austin-Midtown (Jul. 12, 2017), *available at* https://www.tripadvisor.com/ShowUserReviews-g30196-d98441-r501375572-Motel_6_Austin_Midtown-Austin_Texas.html (last visited Feb. 28, 2019).

⁷⁸ Review Of Motel 6 Fremont North (Feb. 2017), *available at* <https://www.kayak.com/Fremont-Hotels-Motel-6-Fremont-North.113185.ksp> (last visited Feb. 28, 2019).

⁷⁹ Review Of Motel 6 Gaithersburg (May 15, 2017), *available at* <https://www.yelp.com/biz/motel-6-gaithersburg> (last visited Feb. 28, 2019).

⁸⁰ Review Of Motel 6 Oshkosh (May 20, 2018), *available at* <https://www.booking.com/reviews/us/hotel/motel-6-oshkosh.html> (last visited Feb. 28, 2019).

⁸¹ Review Of Motel 6 Lawrenceville, NJ (Jul. 10, 2018), *available at* <https://www.travelocity.com/Princeton-Hotels-Howard-Johnson-By-Wyndham-PrincetonLawrenceville.h17767.Hotel-Information> (last visited Feb. 28, 2019).

k. On September 11, 2018, a reviewer of the Motel 6 located at 7541 Nates Road, Columbia, South Carolina posted: “Really nasty. My husband was propositioned and I was asked if I wanted drugs. Lots of men hanging out in lobby selling women. The room was nasty...The parking lot is harboring a sex trafficking situation along with drug sales. We were lucky to get out with our lives.”⁸²

l. A guest who stayed at the Motel 6 located at 1051 Eastern Boulevard, Montgomery, Alabama 36117 in December 2018 wrote: “The drug dealers operating out of some of the rooms. Also there could have been prostitution or human trafficking going on. Very suspicious. Lots of cars in and out all night long.”⁸³

m. In reference to a December 2018, visit to a Motel 6 located at 7640 Cedar Avenue South, Richfield, Minnesota 55423, a reviewer observed: “There’s also clearly some human trafficking going on, but judging from the occasional visits by security and police, nothing is going to be done about that.”⁸⁴

110. The Central Ohio Human Trafficking Task Force completed an investigation which resulted in indictments in August 2012, of several persons charged with human trafficking which occurred at the Motel 6 Columbus on Dublin-Granville Road in Columbus, Ohio as well as other locations.⁸⁵

⁸² Review Of Motel 6 - Columbia, SC (Sept. 11, 2018), *available at* <https://www.yelp.com/biz/motel-6-columbia-2> (last visited Feb. 28, 2019).

⁸³ Review Of Motel 6 Montgomery - East (Jan. 1, 2019), *available at* <https://www.booking.com/hotel/us/montgomery-1051-eastern-boulevard.html#tab-reviews> (last visited Feb. 28, 2019).

⁸⁴ Review Of Motel 6 Minneapolis Airport - Mall Of America (Jan. 8, 2019), *available at* <https://www.booking.com/hotel/us/motel-6-minneapolis-airport-mall-of-america.html#tab-reviews> (last visited Feb. 28, 2019).

⁸⁵ John Fuddy, *Secret Panel On Human Trafficking Wins Indictments*, The Columbus Dispatch (Aug. 3, 2013), <https://www.dispatch.com/content/stories/local/2012/08/03/secret-panel-on-human-trafficking-wins-indictments.html>.

111. Next to the Motel 6 Columbus, another Motel 6 property was shut down by the City of Columbus due to the high number of police reports, including reports and complaints of rape, prostitution, and human trafficking.⁸⁶

112. In addition to the indictments and other evidence of trafficking at a Motel 6 property nearby, Motel 6 Columbus was aware of illegal activity at its premises and refused to do anything about it. One customer who stayed at the Motel 6 Columbus complained that her “[g]randdaughter [stepped] on [a] broken needle left by previous [tenant]” and the manager “would not make out [an incident] report,” so she had to call the police.⁸⁷

113. Defendant Motel 6 Columbus is an alter ego, representative, agent, or co-conspirator of Defendant G6. Defendant G6 exercises or has the right to exercise control over business operations, management, supervision, administration, and procedures of Motel 6 Columbus.

114. Defendants G6 and Motel 6 Columbus are a single and joint employer with a high degree of interrelated, intermingled, and unified operations at the Motel 6 Columbus where the Plaintiff was trafficked for sex. Defendants G6 and Motel 6 Columbus each share the common policies and practices complained of herein.

115. Defendants G6 and Motel 6 Columbus jointly employ or ratify the employment of individuals through horizontal joint employment and or vertical joint employment.

116. As an integrated enterprise and or joint employer, Defendants G6 and Motel 6 Columbus are separately and jointly responsible for compliance with all applicable laws.

⁸⁶ Kocot, *supra* n.62.

⁸⁷ Review of Motel 6 Columbus - Worthington (Aug. 18, 2015), *available at* https://www.expedia.com/Columbus-Hotels-Motel-6-Columbus-Worthington.h14174.Hotel-Information?chkin=3%2F3%2F2019&chkout=3%2F4%2F2019&rm1=a2&hwrqCacheKey=e16976ef-9a17-4721-86d5-f4b08c98537aHWRQ1551645996343&cancellable=false®ionId=874&vip=false&c=c09cca44-f814-4c01-a3f4-c9ce719b313d&&exp_dp=52.99&exp_ts=1551645996754&exp_curr=USD&swpToggleOn=false&exp_pg=HSR (last visited Mar. 3, 2015).

117. As an integrated enterprise and or joint employer, Defendants G6 and Motel 6 Columbus are jointly and severally liable for any damages caused by employees.

118. During the time period relevant to the allegations contained herein, Defendant Motel 6 Columbus was in an agency relationship with Defendant G6 and operated as a public accommodation offering public lodging services in the subject hotel. This agency relationship was created through one or more of the following actions:

- (a) sharing profits,
- (b) standardized training methods for employees;
- (c) building and maintaining Defendant Motel 6 Columbus in a manner specified by Defendant G6;
- (d) standardized or strict rules of operation;
- (e) the ability of Defendant G6 to cancel any agreement with Defendant Motel 6 Columbus if rules are violated;
- (f) regular inspection of Defendant Motel 6 Columbus and operation by Defendant G6;
- (g) prices fixed by Defendant G6; or
- (h) any actions that deprive Defendant Motel 6 Columbus of independence in business operations.

119. For years, both before and after adopting the Code, Defendant G6 has demonstrated willful blindness to the rampant culture of sex trafficking which tragically occurs on its Motel 6 branded properties throughout the country. This same entrenched, pervasive willful blindness to sex trafficking facilitated the sex trafficking of the Plaintiff at the Motel 6 Columbus.

IV. DEFENDANT WYNDHAM'S WILLFUL BLINDNESS TO HUMAN TRAFFICKING AT ITS HOTELS AND PROPERTIES

120. For years Defendant Wyndham has been on notice of repeated incidences of sex trafficking occurring on its Super 8 branded properties, yet Defendant Wyndham has failed to take action to prevent sex trafficking at Super 8 brand properties and still persists in failing to take necessary action to prevent sex trafficking on its properties. Defendant Wyndham's inattention in this regard enabled and contributed to the sex trafficking the Plaintiff suffered at the Super 8 Columbus.

121. There are countless examples across place and time of Wyndham's knowledge of sex trafficking on its branded properties and its continued, total inattention to preventing and remedying the blight of human trafficking on the lives and liberties of its victims.

122. Federal law enforcement apprehended a self-described pimp in 2008 at a Super 8 Motel in Sacramento, California where he was selling a sixteen (16) year old girl for sex.⁸⁸

123. Police arrested a repeat sex trafficker in February 2010, at a Super 8 Motel in Jefferson Parish, Tennessee, where he was found with a fifteen (15) year old girl, and charged him with trafficking children for sexual purposes.⁸⁹

⁸⁸ Kevin Poulsen, 'Y2K Pimp' Gets 12 Years For Recruiting Minor On Myspace, Wired.com (Nov. 8, 2010), <https://www.wired.com/2010/11/epps/>.

⁸⁹ *Tenn. Man Booked In Human Trafficking*, End Slavery.Tennessee (Jun. 1, 2013), <https://www.endslaverytn.org/news/tenn-man-booked-in-human-trafficking-newsarticle>.

124. An FBI investigation ultimately led to a life sentence for a man convicted child sex trafficking who, beginning in March 2010, sold a fifteen (15) year old girl for sex out of a Super 8 Motel in Jacksonville, Florida located at 2228 Phillips Highway.⁹⁰

125. In 2011, Defendant Wyndham's predecessor entity Wyndham Worldwide Corporation, signed the Code, but as evidenced by the widespread sex trafficking which continued to occur at Defendant Wyndham's Super 8 Motel branded properties, Defendant Wyndham did not practice what it preached. Defendant Wyndham's adoption of the Code appears to have been nothing more than a strategic maneuver through which it sought a shield against liability but not a sword against human trafficking.

126. For example, in June 2011, the same year Defendant Wyndham adopted the Code, an MS-13 gang member was indicted for trafficking girls as young as fifteen (15) at a Super 8 Motel just outside of Washington, D.C.⁹¹ In subsequent years, human trafficking continued widespread and unabated on Defendant Wyndham's Super 8 Motel branded properties.

127. The Central Ohio Human Trafficking Task Force completed an investigation which resulted in indictments in August 2012, of several persons charged with human trafficking which occurred at the Super 8 Motel on Dublin-Granville Road in Columbus, Ohio as well as other locations.⁹²

⁹⁰ Press Release, Federal Bureau of Investigation, *Tallahassee Man Sentenced To Life For Child Sex Trafficking* (Jan. 10, 2011), <https://archives.fbi.gov/archives/jacksonville/press-releases/2011/ja011011.htm>.

⁹¹ Laura Lederer, *Sold For Sex: The Link Between Street Gangs And Human Trafficking*, Public Discourse: The Journal Of The Witherspoon Institute (Oct. 21, 2011), <https://www.thepublicdiscourse.com/2011/10/4034/>.

⁹² Fuddy, *supra* n.25.

128. Undercover officers in Cook County, Illinois rescued a seventeen (17) year old girl from a Super 8 Motel in River Grove, Illinois in April 2013, who had been advertised for sex on www.backpage.com. Her trafficker was charged with involuntary servitude of a minor.⁹³

129. Two girls ages seventeen (17) and eighteen (18) were transported by sex traffickers to a Super 8 Motel in St. Paul, Minnesota in June 2013, where they were threatened and forced to have sex with men for money.⁹⁴

130. In August 2013, police went to a Super 8 Motel located at 3308 West Wall Street in Midland, Texas where they identified and ultimately arrested a man who was engaging in sex trafficking a fifteen (15) year old girl.⁹⁵

131. A trafficker took at seventeen (17) year old girl to a Super 8 Motel in West Greenwich, Rhode Island in September 2013 and ultimately pled guilty to federal sex trafficking charges for his criminal conduct.⁹⁶

132. A child sex trafficking sting executed in December 2013 at a Super 8 Motel located at 6616 East Archer Street in Tulsa, Oklahoma led to the arrest and conviction of a man who was sex trafficking two sisters ages fifteen (15) and sixteen (16).⁹⁷

133. In January 2014, authorities in the Austin Police Department Human Trafficking Unit followed a lead to a Super 8 Motel at an exit off I-35 in Austin, Texas where they found a fifteen (15) year old girl who was the victim of sex trafficking.⁹⁸

⁹³ Alexandria Fisher, *Woman Charged With Trafficking Teen Girl*, NBCChicago.com (Apr. 13, 2013), <https://www.nbcchicago.com/news/local/Women-Charged-with-Trafficking-Teen-Girl-202857131.html>.

⁹⁴ Jon Collins, *Ramsey Co. Judge Sentences Sex Traffickers To 21 Years*, MPRNews.org (Sept. 16, 2013), <https://www.mprnews.org/story/2013/09/16/sextrafficking-sentences>.

⁹⁵ *Two Plead In Sex Trafficking Case*, Odessa American (Nov. 21, 2013), https://www.oaoa.com/news/crime_justice/courts/article_08be9e7e-5302-11e3-b6b8-0019bb30f31a.html.

⁹⁶ Michael McKinney, *Missouri Man Pleads Guilty To Sex Trafficking 17-Year-Old Massachusetts Girl To Rhode Island*, Providence Journal (Feb. 27, 2014), <https://www.providencejournal.com/breaking-news/content/20140227-missouri-man-pleads-guilty-to-sex-trafficking-for-bringing-17-year-old-massachusetts-girl-to-rhode-island.ece>.

⁹⁷ David Harper, *Tulsa Prostitution 'CEO' Convicted Of Sex Trafficking*, Tulsa World (May 28, 2013), https://www.tulsaworld.com/news/courts/tulsa-child-prostitution-ceo-convicted-of-sex-trafficking/article_0775afa5-4494-59ca-8333-c8f8496f7958.html.

134. The Big Bend Coalition Against Human Trafficking along with the Tallahassee Police Department found a seventeen (17) year old girl in January 2014, who was being sold for sex at a local Super 8 Motel on North Monroe Street.⁹⁹

135. Also in January 2014, police arrested a sex trafficker at the Super 8 Motel located at 5150 Willow Oak Trail NW, Norcross, Georgia 30093 for his role in selling an underage girl for sex who was found with him on site at the time of his arrest.¹⁰⁰

136. An anti human trafficking task force in Portland, Maine made several arrests in March 2014, including the arrest of a man attempting to flee from the Super 8 Motel in Westbrook.¹⁰¹

137. A woman was sold for sex at at Super 8 Motel located off Highway 169 in Mankato, Minnesota in March 2014, and the perpetrators of the crimes against her were charged with sex trafficking.¹⁰²

138. Also in March 2014, police in Brimfield, Ohio charged a man with two (2) counts of trafficking in persons for selling women for sex out of a local Super 8 Motel.¹⁰³

⁹⁸ *Crimewatch: APD's Human Trafficking Unit*, Fox 7 Austin.com (Aug. 4, 2014), <http://www.fox7austin.com/news/crimewatch-apds-human-trafficking-unit>.

⁹⁹ Sean Rossman, *Arrests For Sex Trafficking 'Tip Of The Iceberg' In Tallahassee*, Tallahassee Democrat (Jun. 2, 2014), <https://www.tallahassee.com/story/news/local/2014/06/02/sex-trafficking-arrests-tallahassee/9856065/>.

¹⁰⁰ Tyler Estep, *Recent Arrest, Indictment Highlight Gwinnett's Sex Trafficking Issue*, Gwinnett Daily Post (Apr. 4, 2014), https://www.gwinnettdailypost.com/archive/recent-arrest-indictment-highlight-gwinnett-s-sex-trafficking-issue/article_96f5f492-ab47-56e5-a980-8b4ca1607db0.html.

¹⁰¹ David Hench, *Sex Trafficking Task Force Arrests Four In Portland Area Sweep*, Portland Press Herald (Mar. 3, 2014), https://www.pressherald.com/2014/03/03/sex_trafficking_task_force_arrests_4_in_portland_area_prostitution_sting/.

¹⁰² Dan Nienaber, *Brother, Sister Charged With Sex Trafficking*, Mankato Free Press (Sept. 2, 2014), http://www.mankatofreepress.com/brother-sister-charged-with-sex-trafficking/article_23b34d47-9c89-505d-90a8-a0200c00fb4f.html.

¹⁰³ Diane Smith, *Man Charged With Human Trafficking In Brimfield*, Record-Courier (Mar. 19, 2014), <https://www.record-courier.com/news/20140319/man-charged-with-human-trafficking-in-brimfield>.

139. Between March and September of 2014, girls ranging in age from fourteen (14) to eighteen (18) were victimized by a sex trafficking ring which operated, in part, out of a Super 8 Motel in Lansing, Michigan through advertisements on www.backpage.com.¹⁰⁴

140. Police in Redding, California arrested a man in May 2014, where he was selling a woman for sex at a local Super 8 Motel.¹⁰⁵

141. In June 2014, federal authorities charged a man with human trafficking after arresting him at a Super 8 Motel in Wyoming, Michigan where he had taken a fifteen (15) year old girl.¹⁰⁶

142. Police rescued a thirteen (13) year old victim from a Super 8 Motel in Moorhead, Minnesota in June 2014, after seeing an advertisement listed on www.backpage.com, and charged her abuser with first-degree sex trafficking.¹⁰⁷

143. In LaGrange, Georgia police discovered an apparent human trafficking ring at the Super 8 Motel off Patillo Road in August 2015 and which involved a sixteen (16) year old girl.¹⁰⁸

144. An undercover federal agent discovered two (2) girls ages eighteen (18) and fifteen (15) at a Super 8 Motel in El Paso, Texas in July 2016, and charged their trafficker with two (2) counts of sex trafficking children by force.¹⁰⁹

¹⁰⁴ Christopher Behnan, *Girls Ages 14 to 18 Involved In Lansing Sex Trafficking Ring*, Lansing State Journal (Nov. 20, 2014), <https://www.lansingstatejournal.com/story/news/local/2014/11/20/witnesses-face-lansing-man-charged-sex-trafficking-ring/70010754/>.

¹⁰⁵ Shay Arthur, *Second Suspect Arrested In Human Trafficking Case*, KRCR News Channel 7.com (May 16, 2014), <https://krctrv.com/archive/second-suspect-arrested-in-human-trafficking-case>.

¹⁰⁶ Barton Deiters, *Man Accused Of Human Trafficking Of 15-Year-Old Girl In Wyoming*, MLive.com (Jun. 24, 2014), https://www.mlive.com/news/grand-rapids/index.ssf/2014/06/man_accused_of_human_trafficki.html.

¹⁰⁷ Emily Welker, *New Child Rape Charges Against Accused Brooklyn Park Sex Trafficker*, Twin Cities Pioneer Press (Oct. 15, 2014), <https://www.twincities.com/2014/10/15/new-child-rape-charges-against-accused-brooklyn-park-sex-trafficker/>.

¹⁰⁸ Melanie Ruberti, *Alleged Human Trafficker Faces Charges*, The LaGrange Daily News (Oct. 3, 2015), <https://www.lagrangenews.com/2015/10/03/alleged-human-trafficker-faces-charges/>.

¹⁰⁹ Aaron Martinez, *Man Pleads Guilty In Sex Trafficking Case*, El Paso Times (Apr. 21, 2017), <https://www.elpasotimes.com/story/news/2017/04/21/man-pleads-guilty-sex-trafficking-case/100754896/>.

145. In Dallas County, Texas a fifteen (15) year old runaway was sold for sex at a local Super 8 Motel in approximately September 2016, and the perpetrator was charged with trafficking of a child.¹¹⁰

146. Two (2) men were arrested in Frederick, Maryland at a Super 8 Motel and in approximately October 2016, were charged with human trafficking-related offenses in relation to their crimes against a juvenile victim.¹¹¹

147. In November 2016, a man was arrested for operating a human trafficking ring out of a Super 8 Motel in Johnstown, Pennsylvania.¹¹²

148. In Nashville, Tennessee police arrested a man who was operating a sex trafficking venture out of a local Super 8 Motel on Old Hickory Boulevard in November 2016.¹¹³

149. The Super 8 Motel on Corporate Woods Parkway in Green, Ohio saw the number of police incidents surge from thirty-seven (37) law enforcement responses in 2015 to ninety-six (96) law enforcement responses in 2016, including FBI agents arresting ten (10) people for human trafficking at the hotel in December 2016.¹¹⁴

¹¹⁰ Tasha Tsiaperas, *Dallas Police: Runaway Teen Raped, Sold Into Prostitution*, Dallas News (Sept. 15, 2016), <https://www.dallasnews.com/news/crime/2016/09/15/dallas-police-runaway-teen-raped-sold-prostitution>.

¹¹¹ *Two Charged In Maryland With Rape, Human Trafficking, Others*, NBCWashington.com (Oct. 1, 2016), <https://www.nbcwashington.com/news/local/Two-Charged-in-Maryland-with-Rape-Human-Trafficking-Others-395505801.html>.

¹¹² Randy Griffith, *Police: Human Trafficking Ring Busted In Richland Township*, The Tribune-Democrat (Nov. 1, 2016), https://www.tribdem.com/news/police-human-trafficking-ring-busted-in-richland-township/article_9084f9da-9fb6-11e6-be30-43b26140c0c3.html.

¹¹³ Adrian Mojica, *Nashville Police Bust Man Accused In Escort Service, Sex Trafficking Organization* (Nov. 16, 2016), <https://fox17.com/news/local/nashville-police-bust-man-accused-in-escort-service-sex-trafficking-organization>.

¹¹⁴ Eric Poston, *City Of Green Hoping To Curb Rise Of Criminal Activity At Super 8 Hotel*, The Suburbanite.com (Feb. 28, 2017), <https://www.thesuburbanite.com/news/20170228/city-of-green-hoping-to-curb-rise-of-criminal-activity-at-super-8-hotel>.

150. From February 2016 through approximately October 2017, a sex trafficking ring operated out of a Super 8 Motel in Fort Worth, Texas and trafficked at least five (5) juveniles including an individual as young as sixteen (16) years old.¹¹⁵

151. In February 2017, a defendant pled guilty to human trafficking and was sentenced to eight (8) years in prison for holding a woman with developmental disabilities captive at a Super 8 Motel on Glensprings Drive in Cincinnati, Ohio and selling her for sex.¹¹⁶

152. Law enforcement shut down a Super 8 Motel on Brice Road in Columbus, Ohio in May 2017 because it was a hub for prostitution, violence, and drug trafficking. Between 2015 and the time it was shut in 2017, local law enforcement made over 300 emergency runs to the Brice Road Super 8 Motel.¹¹⁷

153. Authorities busted a sex trafficking operation at a Super 8 Motel in Lakeland, Tennessee in June 2017, and rescued a nineteen (19) year old girl who was being held against her will and sold for sex.¹¹⁸

154. Two (2) women were victims of sex trafficking at a Super 8 Motel on Hypoluxo Road in Lantana, Florida where area police rescued them in May 2018.¹¹⁹

155. A July 2018, investigation on the premises of the Super 8 Motel located at 2935 Warm Springs Road Columbus, Georgia led to human trafficking charges against multiple suspects.¹²⁰

¹¹⁵ Domingo Ramirez, Jr., *Statewide Sex-Trafficking Ring Operating In Fort Worth Shut Down With Eight Arrests*, Star-Telegram (Oct. 17, 2017), <https://www.star-telegram.com/news/local/community/fort-worth/article179323426.html>.

¹¹⁶ Kevin Grasha, *Woman Forced Into Prostitution At Springdale Motel*, Cincinnati.com (Feb. 27, 2017), <https://www.cincinnati.com/story/news/2017/02/27/victim-sex-trafficking-case-had-childlike-mind/98481848/>.

¹¹⁷ Lisa Rantala, *City Shuts Down East Side Motel, Citing Prostitution And Drugs*, ABC6OnYourSide.com (May 23, 2017), <https://abc6onyourside.com/news/local/city-shuts-down-east-side-motel-citing-prostitution-and-drugs>.

¹¹⁸ *Sex Trafficking Operation Busted At Super 8 In Lakeland*, WMC5 Action News (Jun. 13, 2017), <http://www.wmcactionnews5.com/story/35657458/sex-trafficking-operation-busted-at-super-8-in-lakeland/>.

¹¹⁹ Gary Detman, *Three Men Charged In Human Trafficking Investigation*, CBS12.com (May 24, 2018), <https://cbs12.com/news/local/3-men-charged-in-human-trafficking-investigation>.

156. A sixteen (16) year old boy who authorities believe to be a victim of human trafficking was rescued from a Super 8 Motel in Duson, Louisiana in August 2018.¹²¹

157. In September 2018, a former member of the Oklahoma state legislature was sentenced to fifteen (15) years in prison on charges of child sex trafficking after he was found in room at a Super 8 Motel Cleveland County, Oklahoma, in March 2017, with a seventeen (17) year old boy.¹²²

158. Deputies in Harris County, Texas arrested a man for sex trafficking a fourteen (14) year old girl out of a local Super 8 Motel in February 2019.¹²³

159. Additionally, Defendant Wyndham has been aware of sex trafficking occurring on Super 8 Motel branded properties through online review websites such as www.yelp.com. Online reviews show the pervasiveness of customer reported sex trafficking on Super 8 Motel brand properties and Defendant Wyndham's inattentiveness, for example:

a. In May 2012, a guest of the Super 8 Motel located at 3550 Crain Highway, Waldorf, Maryland 20602 decried: "There was also prostitution going on at the hotel. Absolutely disgusting don't ever stay here!!!!!!!!!!!"¹²⁴

b. A review posted in October 2013, of the Super 8 Motel located at 1010 West Ocean View Avenue in Norfolk, Virginia stated: "The big thing was the blatant open

¹²⁰ Ben Wright, *Threesome And Drugs: Escorting App Leads To Human Trafficking Charges, Columbus Police Say*, Ledger-Enquirer (Jul. 12, 2018), <https://www.ledger-enquirer.com/latest-news/article214760585.html>.

¹²¹ Lester Duhé, *Authorities Investigate Human Trafficking Case Involving 16-Year-Old Boy*, KLFY.com (Aug. 10, 2018), <https://www.klfy.com/news/local/authorities-investigate-human-trafficking-case-involving-16-year-old-boy/1360573674>.

¹²² Nolan Clay, *Former Oklahoma Senator Sentenced To Prison For Child Sex Trafficking*, NewsOk.com (Sept. 17, 2018), <https://newsok.com/article/5608554/former-oklahoma-senator-sentenced-to-prison-for-child-sex-trafficking>.

¹²³ Bryan Kirk, *Sex Trafficking Victim, 14, Rescued During Disturbance Call*, Patch (Feb. 22, 2019), <https://patch.com/texas/houston/sex-trafficking-victim-14-rescued-during-medical-call>.

¹²⁴ Review Of Super 8 By Wyndham - Waldorf (May 3, 2012), available at <https://www.yelp.com/biz/super-8-by-wyndham-waldorf-waldorf> (last visited Mar. 1, 2019).

prostitution that was condoned by your chain was despicable...Shame on you Super 8 for condoning this kind of activity just to fill a room.”¹²⁵

c. A guest of the Super 8 Motel located at 2801 North Monroe Street, Tallahassee, Florida 32303 observed in May 2014: “If there is somewhere in town where all the drug deals, rapes, prostitution and other sketchy shit goes down....this is for sure the place. It is not comforting, welcoming, clean, hospitable or safe in ANY WAY.”¹²⁶

d. A guest wrote in May 2014, regarding the Super 8 Motel in Knoxville, Tennessee at 341 Merchants Drive: “I suspect [the hotel] is renting rooms on the side and in cash to prostitutes that frequent this establishment. There was obvious prostitution going on around this hotel late at night.”¹²⁷

e. In June 2015, a review of the Super 8 Motel located at 727 44th Street SW, Wyoming, Michigan 49509 stated: “I am pretty sure there was sex trafficking going on but they didn’t keep us awake so it was fine.”¹²⁸

f. A guest at the Super 8 Motel located at 40 Arsenal Road, York, Pennsylvania 17404 reported in August 2015: “This place has been constantly a hotbed for drugs and prostitution.”¹²⁹

g. A reviewer described the Super 8 Motel located at 101 Flat Creek Road, Black Mountain, North Carolina 28711 in October 2015, as follows: “Not only were there women dressed prostitutes outside [*sic*] . . . [t]he room was absolutely disgusting.”¹³⁰

¹²⁵ Review Of Super 8 By Wyndham - Norfolk / Chesapeake Bay (Oct. 16, 2013), *available at* <https://www.yelp.com/biz/super-8-by-wyndham-norfolk-chesapeake-bay-norfolk> (last visited Mar. 1, 2019).

¹²⁶ Review Of Super 8 Tallahassee (May 13, 2014), *available at* <https://www.yelp.com/biz/super-8-motel-tallahassee-tallahassee> (last visited Mar. 1, 2019).

¹²⁷ Review Of Super 8 By Wyndham Knoxville - Downtown (May 26, 2014), *available at* <https://www.yelp.com/biz/super-8-by-wyndham-knoxville-downtown-area-knoxville> (last visited Mar. 1, 2019).

¹²⁸ Review Of Super 8 By Wyndham - Grand Rapids / Wyoming Michigan (Jun. 30, 2015), *available at* <https://www.yelp.com/biz/super-8-by-wyndham-wyoming-grand-rapids-area-wyoming> (last visited Mar. 1, 2019).

¹²⁹ Review Of Super 8 By Wyndham - York (Aug. 18, 2015), *available at* <https://www.yelp.com/biz/super-8-by-wyndham-york-york> (last visited Mar. 1, 2019).

h. In April 2017, a reviewer of the Super 8 Motel located at 32 Grenhart Road, Stamford, Connecticut 06902 wrote: “[D]o not stay here. [A] prostitution ring ran inside and out of hotel that the hotel staff is completely aware of.”¹³¹

i. A guest staying at the Super 8 Motel located at 610 John C. Calhoun Drive, Orangeburg, South Carolina 29115 complained of the accommodations in April 2017: “That’s not even the worst part, drugs and prostitution happening all hours of the night[.]”¹³²

j. In May 2018, a guest of the Super 8 Motel located at 9920 Washington Boulevard, Laurel, Maryland 20723 recounted: “Pulling up on this hotel at 1 am on a Sunday night, I was greeted by 2 prostitutes standing by their pimps car that was parked in FRONT of the lobby.”¹³³

k. A guest who stayed at a Super 8 Motel located at 2070 Solano Avenue, Vallejo, California 94590 in April 2018, described their experience as follows: “As I walked inside the hotel I saw what Looked like a prostitution ring (interesting ladies and one male).”¹³⁴

l. Another guest who stayed at the same Super 8 Motel wrote in September 2018: “Worst experience at a motel EVER!!! This place is a hub for drug dealers and prostitutes!”¹³⁵

¹³⁰ Review Of Super 8 By Wyndham - Black Mountain (Oct. 10, 2015), *available at* <https://www.yelp.com/biz/super-8-by-wyndham-black-mountain-black-mountain> (last visited Mar. 1, 2015).

¹³¹ Review Of Super 8 By Wyndham - Stamford (Apr. 30, 2017), *available at* <https://www.yelp.com/biz/super-8-by-wyndham-stamford-new-york-city-area-stamford> (last visited Mar. 1, 2015).

¹³² Review Of Super 8 Orangeburg (Apr. 15, 2017), *available at* <https://www.yelp.com/biz/super-8-orangeburg-orangeburg> (last visited Mar. 1, 2019).

¹³³ Review Of Super 8 By Wyndham - Laurel (May 21, 2018), *available at* https://www.yelp.com/biz/super-8-by-wyndham-laurel-laurel?adjust_creative=mapquest&hrid=Llf5vn-LMXIqb6wkWnWDqw&utm_campaign=yelp_feed&utm_medium=feed_v2&utm_source=mapquest (last visited Mar. 1, 2019).

¹³⁴ Review Of Super 8 - Vallejo / Napa Valley (Apr. 22, 2018), *available at* <https://www.yelp.com/biz/super-8-vallejo-napa-valley-vallejo> (last visited Mar. 1, 2019).

¹³⁵ Review of Super 8 - Vallejo / Napa Valley (Sept. 16, 2018), *available at* <https://www.yelp.com/biz/super-8-vallejo-napa-valley-vallejo> (last visited Mar. 1, 2019).

160. The Super 8 Columbus, where H.H. was trafficked, was also aware of the illegal activity occurring on its property during the time H.H. was being trafficked there.

a. In July 2013, a customer at the Super 8 Columbus wrote of his stay: “I [didn’t] like the hookers and pimps [continually] hanging around the parking area and sitting at entrance door C.”¹³⁶

b. Regarding a June 2014 stay at the Super 8 Columbus, one customer wrote, “We got to the hotel just in time for the police to swoop in with several cars to arrest some one - this did not seem to disturb the prostitutes one bit. Perhaps they have developed their great work ethic from their ever present pimps...”¹³⁷

c. That same month, in June 2014, Columbus prosecutors obtained a temporary restraining order to shut down the Super 8 Columbus due to ongoing complaints of prostitution and drug activity.¹³⁸ This legal action followed complaints from the local police, including a letter which was sent to the Super 8 Columbus’s management in February 2014, notifying the motel of solicitation and drug trafficking cases which had taken place over the previous five (5) months.¹³⁹

d. In June 2015, during the time H.H. was being trafficked at the Super 8 Columbus, a customer wrote: “People at the hotel [were] smoking weed and a prostitute approach[ed] my husband. Please save yourself and book another room.”¹⁴⁰

¹³⁶ Review of Super 8 by Wyndham - Columbus (Jul. 2013), *available at* https://www.tripadvisor.com/Hotel_Review-g50226-d123898-Reviews-Super_8_by_Wyndham_Columbus-Columbus_Ohio.html (last visited Mar. 3, 2019).

¹³⁷ Review of Super 8 by Wyndham - Columbus (Jun. 2014), *available at* https://www.tripadvisor.com/Hotel_Review-g50226-d123898-Reviews-Super_8_by_Wyndham_Columbus-Columbus_Ohio.html (last visited Mar. 3, 2019).

¹³⁸ Mark Ferencik, *No More Super 8: City Closes Yet Another Hotel On Rte. 161*, The Columbus Dispatch (Jun. 24, 2014), <https://www.dispatch.com/content/stories/local/2014/06/24/City-closes-Super-8-hotel.html>.

¹³⁹ *Id.*

¹⁴⁰ Review of Super 8 by Wyndham - Columbus (Jun. 22, 2015), *available at* <https://www.expedia.com/Columbus-Hotels-Super-8-By-Wyndham-Columbus.h569329.Hotel-Information> (last visited Mar. 3, 2019).

161. Defendant Super 8 Columbus is an alter ego, representative, agent, or co-conspirator of Defendant Wyndham. Defendant Wyndham exercises or has the right to exercise control over business operations, management, supervision, administration, and procedures of Defendant Super 8 Columbus.

162. Defendants Wyndham and Super 8 Columbus are a single and joint employer with a high degree of interrelated, intermingled, and unified operations at the Super 8 Columbus where the Plaintiff was trafficked for sex. Defendants Wyndham and Super 8 Columbus each share the common policies and practices complained of herein.

163. Defendants Wyndham and Super 8 Columbus jointly employ or ratify the employment of individuals through horizontal joint employment and or vertical joint employment.

164. As an integrated enterprise and or joint employer, Defendants Wyndham and Super 8 Columbus are separately and jointly responsible for compliance with all applicable laws.

165. As an integrated enterprise and or joint employer, Defendants Wyndham and Super 8 Columbus are jointly and severally liable for any damages caused by employees.

166. During the time period relevant to the allegations contained herein, Defendant Super 8 Columbus was in an agency relationship with Defendant Wyndham and operated as a public accommodation offering public lodging services in the subject hotel. This agency relationship was created through one or more of the following actions:

(a) sharing profits,

(b) standardized training methods for employees;

(c) building and maintaining Defendant Super 8 Columbus in a manner specified

by Defendant Wyndham;

- (d) standardized or strict rules of operation;
- (e) the ability of Defendant Wyndham to cancel any agreement with Defendant Super 8 Columbus if rules are violated;
- (f) regular inspection of Defendant Super 8 Columbus and operation by Defendant Wyndham;
- (g) prices fixed by Defendant Wyndham; or
- (h) any actions that deprive Defendant Super 8 Columbus of independence in business operations.

167. For years, both before and after adopting the Code, Defendant Wyndham has demonstrated willful blindness to the rampant culture of sex trafficking which tragically occurs on its Super 8 Motel branded properties throughout the country. This same entrenched, pervasive willful blindness to sex trafficking facilitated the sex trafficking of Plaintiff H.H at Defendant Super 8 Columbus.

CAUSE OF ACTION

COUNT ONE

VIOLATION OF THE TVPRA, 18 U.S.C §1595
(Against All Defendants)

168. The Plaintiff adopts and incorporates by reference each and every allegation contained in the preceding paragraphs of this Complaint as if fully set forth herein.

169. The Plaintiff is a survivor of sex trafficking within the meaning of 18 U.S.C. § 1591 and is entitled to bring a civil action under 18 U.S.C. § 1595 against any individual or

entity whose violations of the TVPRA proximately caused the Plaintiff to sustain physical and psychological injuries.

170. The Defendants knowingly benefited from participating in a venture which they knew was engaged in illegal sex trafficking in violation of the TVPRA, 18 U.S.C. § 1591(a)(2), by, *inter alia*, engaging in acts and omissions that were intended to support, facilitate, harbor, and otherwise further the trafficker's sale and victimization of the Plaintiff for commercial sexual exploitation. Defendants knew that their repeated failures to address known risks of human trafficking on their hotel properties would increase the overall volume of illegal commercial sexual exploitation and victimization at their hotel properties. Defendants knowingly benefited from facilitating the trafficking of persons on the hotel properties.

171. Defendants knowingly benefited financially from the presence of traffickers at their hotel properties by consistently renting rooms where a trafficker repeatedly sold the Plaintiff for sex at Defendants' hotel properties and accordingly, participated in the trafficking venture that exploited her by the various means described herein.

172. The Plaintiff has suffered substantial physical and psychological injuries, and other damages, as a result of being trafficked at Defendants' hotel properties.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff requests that the jury selected to hear this case render a verdict in her favor on all counts alleged and against each and every Defendant, jointly and severally, and that it award compensatory and punitive damages to her in an amount which will adequately compensate her for the injuries and damages she suffered due to the Defendants' misconduct outlined herein. Also, on the basis of the foregoing, the Plaintiff requests that the jury award damages to the Plaintiff in an amount which will adequately reflect the enormity of

the Defendants' wrongdoing and which will effectively prevent other similar bad acts. Further, the Plaintiff requests that this Honorable Court enter a judgment consistent with the jury's verdict, and that it also award the Plaintiff interest from the date of judgment and the costs incurred by the Court in managing this lawsuit, plus attorneys' fees and costs. Plaintiff further prays for any other damages and equitable relief the Court or jury deems appropriate under the circumstances.

JURY DEMAND

Plaintiff hereby demands a trial by struck jury.

/s/ Steven C. Babin, Jr.

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